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March 26, 2012

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Communication, WT Docket No. 12-69

Dear Ms. Dortch:

On Friday, March 23, Joan Marsh sent Louis Peraetz, legal advisor to Commissioner Clyburn, a link to a blog posting entitled No MHz Left Behind, posted at <http://attpublicpolicy.com/wireless/no-mhz-left-behind>. A copy of that blog posting is also attached.

Sincerely,

/s/ Joseph P. Marx
Assistant Vice President, AT&T Services Inc.

cc: (via e-mail)
Louis Peraetz



No MHz Left Behind

Posted by: [Joan Marsh](#) on March 23, 2012 at 11:25 am

[Rick Kaplan](#), the FCC's Wireless Bureau Chief, could not have been more correct when he declared his mission at this week's open meeting to be "no MHz left behind." Given the scarcity of available spectrum – and the challenges the FCC is facing trying to free up new spectrum for mobile Internet use – ensuring that all licensed spectrum is fully and efficiently deployable is essential.

At this week's Open Meeting, the FCC [opened a proceeding](#) to explore solutions for interoperability in the lower 700 MHz band. Some have and will continue to focus on only the narrow question of the use of two band classes in the lower band and whether the FCC should require the use of a single band class. These entities would like the FCC to simply ignore the significant interference challenges that led the [3GPP standards-setting body](#) to create two band classes in the first place. But, contrary to what some carriers claim, it is not the existence of two band classes that is preventing lower A-block deployment. Band Class 12 chipsets are available. US Cellular has announced the rollout of its [4G LTE network](#) in the lower 700 MHz band and its first two LTE devices – a Samsung Galaxy smartphone and tablet. And they promise that more devices will be rolled out this year. C-Spire is also expected to proceed this year with its A-block LTE deployment.

The far bigger deployment challenge in the Lower 700 MHz band is one that few folks have wanted to talk about. The hard fact is that current FCC rules flat out prohibit 700 MHz A-block deployment in more than 30 markets across the country, including New York City, San Francisco and Chicago – markets where additional spectrum and network capacity are the most urgently needed. These deployment holes, or "exclusion zones," are the product of FCC rules that prohibit the operation of 700 MHz A-block devices in the areas where there are over-the-air Channel 51 broadcast signals. The map below shows in red the contours of the broadcast signals for current Channel 51 licensees with an overlay of EA market boundaries for the A-block licenses impacted. These broadcast areas create a patchwork of holes across the nation where A-block deployment will continue to be prohibited until the regulatory challenges of the lower 700 MHz band are fully confronted and resolved.

AT&T is committed to the search for real solutions that will allow full deployment of the 700 MHz lower A-block. Full deployment in the lower 700 MHz band will not be achieved without addressing this challenge. No MHz left behind will be our battle cry as well.

DTV Channel 51 Contours
EA Market Boundary Overlay & EAs Impacted

